



Draft Site-Wide Environmental
Impact Statement for the
Oak Ridge Y-12 Plant
U.S. Department of Energy

Written Comment Form

I am opposed to the EIS as it stands because
of several reasons:

- ① The claims made in the Y-12 EIS about safety in the workplace are not consistent with the historic & current management practice and are simply not credible. Important maintenance has been deferred for years, and worker safety is obviously not a priority commitment.
 - ② The Y-12 EIS does not address the larger economic questions which make clear the trade-offs required for an investment of \$4 billion in a new bomb plant.
 - ③ These new facilities compel continued nuclear weapons development in other countries. The Y-12 EIS violates US nonproliferation goals.
- Thank you for hearing the public, now let's just hope you care enough to listen.

Megan B. Carter

Please use other side if more space is needed.

Comment forms may be mailed using the self-mailer on the reverse or forms may be faxed to:
Mr. Gary Hartman
865-576-1237

Fold page in half and seal with tape before mailing. Please do not use staples.

Comment No. 1

Issue Code: 14

Comment noted. Existing Y-12 facilities are safe and comply with appropriate safety and environmental requirements. The HEU Materials Facility and the Special Materials Complex would provide more protection from natural phenomena events and accidental releases. DOE believes that it has adequately addressed impacts to public health and safety that could result from implementing the various alternatives. Volume I, Chapter 5 of the Y-12 SWEIS addresses impacts to public health and safety from the proposed alternatives, and Volume II, Appendices D and E provide further detailed analyses related to human health effects from normal operations/facility accidents, and air quality, respectively. (See also response to Comment No. 26 regarding fire mitigation and worker safety on page 217.)

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Comment No. 2

Issue Code: 16

DOE is not planning or proposing a new bomb plant at Y-12. The purpose of the NEPA process is to ensure that accurate environmental studies are performed; that they are done with public involvement; and that public officials make decisions based on an understanding of the environmental consequences. Macro-economic analysis is outside the scope of NEPA. NEPA requires an analysis of socioeconomic impacts which is included in Section 5.3 of the Y-12 SWEIS.

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3/16

DOE is responsible for meeting the current requirements of the Nuclear Weapons Stockpile Memorandum set forth by the President and Congress. The need for nuclear weapons and the alternative uses of the Nation's funds are beyond the scope of the Y-12 SWEIS.

Comment No. 3

Issue Code: 16

Parties to the Nuclear Nonproliferation Treaty agree not to directly or indirectly transfer nuclear weapons or other nuclear explosive devices or control over them to any recipient; and not to in any way assist, encourage, or induce nonnuclear weapon states to manufacture or alter use, or acquire nuclear weapons, or alter nuclear explosive devices or control over them. Continuation of the Y-12 mission, and construction and operation of a HEU Materials Facility or Special Materials

Comment No. 3 (cont.)**Issue Code: 16**

Complex by the United States does not conflict with such an agreement. The proposed action which includes continuing weapons dismantlement activities at Y-12 fully supports the goals of Article VI of the Nuclear Nonproliferation Treaty, in which signatory nations agree to work toward total disarmament. Since the end of the Cold War, the United States has significantly reduced the size of the nuclear weapons stockpile, and DOE has dismantled more than 15,000 nuclear weapons. At the present time, the U.S. is further downsizing the nuclear weapons stockpile consistent with the terms of START I and the recently ratified START II.

The purpose of nonproliferation efforts is to keep non-weapons states from acquiring nuclear weapons while weapons states work toward the longer term goal of achieving total nuclear disarmament. Non-weapons states that have agreed not to manufacture nuclear weapons are not likely to be encouraged to do so as a result of the Y-12 National Security Complex continuing weapons support mission activities. As for rogue states bent on obtaining nuclear weapons at any cost, it is doubtful that Y-12 mission activities would have any influence on their nuclear weapons endeavors.